

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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NOVARTIS PHARMACEUTICALS  
CORPORATION,

Plaintiff,

v.

ACTAVIS LLC; APOTEX, INC.;  
APOTEX, CORP.; GLAND PHARMA  
LTD.; DR. REDDY'S LABORATORIES,  
INC.; DR. REDDY'S LABORATORIES  
LTD.; EMCURE PHARMACEUTICALS  
USA, INC.; EMCURE  
PHARMACEUTICALS, LTD; HOSPIRA,  
INC.; PHARMACEUTICS  
INTERNATIONAL INC.; SAGENT  
PHARMACEUTICALS, INC.; ACS  
DOBFAR INFO S.A.; STRIDES, INC.;  
AGILA SPECIALTIES PRIVATE LTD.;  
SUN PHARMA GLOBAL FZE;  
CARACO PHARMACEUTICAL  
LABORATORIES, LTD; SUN  
PHARMACEUTICAL INDUSTRIES  
LTD.; WOCKHARDT USA LLC; and  
WOCKHARDT LTD.

Defendants.

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Civil Action No. 13-1028 (SDW) (MCA)

**DECLARATION OF ROBERT W. TRENCHARD IN SUPPORT OF  
NOVARTIS'S OPPOSITION TO WOCKHARDT'S MOTION TO DISMISS COUNT II  
OF THE CORRECTED AMENDED COMPLAINT**


I, Robert W. Trenchard, declare as follows:

1. I am a partner at Wilmer, Cutler, Pickering, Hale and Dorr LLP, 7 World Trade Center, 250 Greenwich St., New York, NY 10007, and counsel for Plaintiff Novartis Pharmaceuticals Corporation ("Novartis") in the above-captioned matter.

2. I submit this declaration in support of Novartis's Opposition to Wockhardt's Motion to Dismiss Count II of the Corrected Amended Complaint.
3. Attached hereto are true and accurate copies of the following exhibits:
  - (1) (SEALED) Transcript, Expedited Discovery Hearing (February 27, 2013)
  - (2) (SEALED) Wockhardt Section viii Statement (September 18, 2012)

I declare under penalty of perjury that the foregoing is true and correct.

DATED: May 6, 2013

  
Robert W. Trenchard